Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

Conditional Major final permit No. F-03-035

Monessen Hearth Systems
Paris, Kentucky
December 10, 2003

REVIEWER: Sajjad Quabili
Plant I.D. 21-017-00030

Application Log # 55673

Revision 1:

Log #56479

Monessen has proposed to add two paint spray booths (EP#6 and EP #7) and five drying ovens (insignificant activity). This modification will not trigger any new regulation and the source wide emission limits will stay unchanged. Therefore, this addition is processed under 52:030, Section 14, minor permit revisions.

SOURCE DESCRIPTION:

Monessen Hearth Systems operates a fabricated metal-products manufacturing plant located at 149 Cleveland Drive, Paris. The paint operation consists of spray booths and dip painting machines. Exhaust filters are used to control particulate matter.

PERMITTING BACKGROUND:

The source has applied to the Division to renew their Conditional Permit (F-98-022, Revision 1) and also construct a spray booth (Ep#5).

COMMENTS:

The plant-wide allowable emission limits are as follow:

- 1. Single HAP emissions shall not exceed 9 tons per year.
- 2. Combined HAP emissions shall not exceed 22.5 tons per year.
- 3. VOC emissions shall not exceed 90 tons per year.

APPLICABLE REGULATIONS:

The source is subject to 401 KAR 59:010, New process operations for the particulate emitted.

PERIODIC MONITORING:

Compliance with annual allowable emission limits will be ensured by monitoring, record keeping and reporting specified in the permit.

The permittee shall keep calendar month records of the usage of coatings, solvents, and clean up solvents and any other VOC/HAP containing material. At the end of each month volatile organic compound (VOC) and hazardous air pollutants (HAPs) emissions shall be calculated and recorded. These records shall be summarized and tons per month VOC/HAP emissions calculated and recorded. Tons of VOC/HAP per 12 months shall be recorded. The recorded tons per 12 months shall be a 12 months rolling total representing the most recent year.

OPERATIONAL FLEXIBILITY:

Operational flexibility is allowed under the permit by not placing throughput or emissions limits on individual machines, but by placing all machines under a plant wide emissions cap (See Periodic Monitoring above).

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.